

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

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In Re:

TODD M. LEKAN,

Debtor.

Case No. 23-11768-cjf

Chapter 11

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**NOTICE FOR HEARING ON APPROVAL OF TODD M. LEKAN'S  
AMENDED DISCLOSURE STATEMENT DATED FEBRUARY 24, 2025,  
AND SETTING TIME TO FILE OBJECTIONS TO AMENDED DISCLOSURE  
STATEMENT**

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TO: All parties in interest:

An Amended Disclosure Statement under Chapter 11 of the Bankruptcy Code was filed by Todd M. Lekan ("Debtor") on February 24, 2025.

**NOTICE IS HEREY GIVEN THAT:**

1. The hearing to consider the approval of the Debtor's Amended Disclosure Statement Dated February 24, 2025, will be held in Courtroom 350 of the Robert W. Kastenmeier U.S. Courthouse at 120 North Henry Street, Room 350, in the City of Madison, Wisconsin, 53703 on **APRIL 18, 2025, at 10:30 a.m.**
2. The Court permits parties to appear at said hearing in accordance with the terms and provisions of the Court's Order and Instructions for Appearance by Zoom (Evidentiary Hearing) attached to this Notice for Hearing.
3. A copy of Debtor's Amended Disclosure Statement Dated February 24, 2025, and Exhibits ("Amended Disclosure Statement") are all attached to this Notice for Hearing.
4. Objections to the Amended Disclosure Statement shall be filed in accordance with Rule 3017(a) not less than five (5) days prior to the hearing on the Amended Disclosure Statement.
5. All objections shall be made in writing, shall state the basis for the objection with specificity, shall be filed with the Clerk of the United States Bankruptcy Court at the address indicated above, and shall be served upon the undersigned attorney for the Debtor at the address set forth below, and the United States Trustee, located at 780 Regent Street, Suite 304, Madison, Wisconsin, 53715.

6. The Debtor, by his attorneys, shall transmit the Amended Disclosure Statement and Exhibits to each member of a creditors committee appointed pursuant to Section 1102 of the Bankruptcy Code, if any, and to any party in interest who requests in writing a copy of the Amended Disclosure Statement.
7. Requests for copies of the Amended Disclosure Statement and Exhibits must be in writing and shall be mailed to Krekeler Law, S.C., the attorneys for the Debtor-in-Possession, at 26 Schroeder Court, Suite 300, Madison, WI 53711.

Dated this 19th day of March, 2025.

**KREKELER LAW, S.C.**

By: 

Noe J. Rincon  
State Bar No. 1124893  
Attorneys for Debtor,  
Todd M. Lekan

Address:

26 Schroeder Court, Suite 300  
Madison, WI 53711  
Phone: 608-258-8555  
Fax: 608-258-8299  
[nrincon@ks-lawfirm.com](mailto:nrincon@ks-lawfirm.com)

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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In Re:

TODD M. LEKAN,  
  
Debtor.

Case No. 23-11768-cjf  
Chapter 11

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CERTIFICATE OF SERVICE

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The undersigned, being first duly sworn on oath, deposes and says that on March 19, 2025, the undersigned, Cheryl Watson, electronically filed with the Clerk of Court and served upon the United States Trustee, the Debtor's attorney, and any other person designated by the Court using the ECF system, the following documents: (1) Notice of Hearing on Approval of Todd M. Lekan's Amended Disclosure Statement Dated February 24, 2025, and Setting Time to File Objections to Amended Disclosure Statement dated February 24, 2025, and (2) a copy of the Amended Disclosure Statement of Todd M. Lekan dated February 24, 2025, with exhibits attached to:

U.S. Trustee's Office

Email: [USTPRegion11.MD.ECF@usdoj.gov](mailto:USTPRegion11.MD.ECF@usdoj.gov)

Jennifer K. Niemeier, on behalf of Office of the United States Trustee

Email: [Jennifer.Niemeier@usdoj.gov](mailto:Jennifer.Niemeier@usdoj.gov)

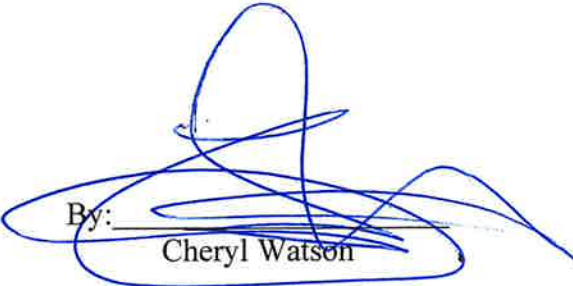
Brian P. Thill, on behalf of Office of the United States Trustee

Email: [BrianP.Thill@usdoj.gov](mailto:BrianP.Thill@usdoj.gov)

The undersigned, being first duly sworn on oath, deposes and says that on March 19, 2025, the undersigned mailed, properly enclosed in a postpaid envelope, a copy of the: (1) Notice of Hearing on Approval of Todd M. Lekan's Amended Disclosure Statement Dated February 24, 2025, and Setting Time to File Objections to Amended Disclosure Statement dated February 24, 2025, and (2) a copy of the Amended Disclosure Statement of Todd M. Lekan dated February 24, 2025, with exhibits attached to all on the attached list and to:

Internal Revenue Service  
ATTN: Erica Highbaugh  
575 N Pennsylvania Street  
M/S SB380  
Indianapolis, IN 46204

Todd M. Lekan  
333 Brown Deer Road  
Unit G-1911  
Milwaukee, WI 53217

By:   
Cheryl Watson

Label Matrix for local noticing  
0758-3  
Case 3-23-11768-cjf  
Western District of Wisconsin www.wiwb.uscour  
Madison  
Wed Mar 19 15:00:40 CDT 2025  
  
(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

Capital One  
PO Box 4069  
Carol Stream IL 60197-4069  
  
Fidelity  
Cardmember Services  
PO Box 790408  
Saint Louis, MO 63179-0408

Capital One, N.A.  
by AIS InfoSource LP as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

IRS - Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Internal Revenue Service  
Bankruptcy Notices  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Todd M Lekan  
333 Brown Deer Road  
Unit G-1911  
Milwaukee, WI 53217-2372

Marissa Metelica & Jason Reif  
1034 Halsey St., #1  
Brooklyn, NY 11207-1016

Murphy Desmond S.C.  
P.O. Box 2038  
Madison, WI 53701-2038

Nicolet National Bank  
fka Advantage Community Bank  
210 N 17th Avenue  
Wausau, WI 54401-4223

Jennifer K Niemeier  
Office of the United States Trustee  
780 Regent Street, Suite 304  
Madison, WI 53715-1233

Office of the United States Trustee  
780 Regent Street  
Suite 304  
Madison, WI 53715-1233

Nicole I. Pellerin  
33 East Main Street Suite 500  
P.O. Box 2038  
Madison, WI 53701-2038

Noe Joseph Rincon  
Krekeler Law S.C.  
26 Schroeder Court, Suite 300  
Madison, WI 53711-2503

Secretary of Treasury  
Treasury Department  
1500 Pennsylvania Avenue N.W.  
Washington, DC 20220-0001

Securities and Exchange Commission  
175 West Jackson Boulevard  
Suite 900  
Chicago, IL 60604-2908

Kristin J. Sederholm  
Krekeler Law, S.C.  
26 Schroeder Court, Suite 300  
Madison, WI 53711-2503

Brian P. Thill  
Office of the United States Trustee  
780 Regent Street  
Suite 304  
Madison, WI 53715-1233

U.S. Bank NA dba Elan Financial Services  
Bankruptcy Department  
PO Box 108  
Saint Louis, MO 63166-0108

U.S. Trustee's Office  
780 Regent Street, Suite 304  
Madison, WI 53715-1233

US Cellular  
PO Box 0203  
Palatine, IL 60078-0203

United States Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Wisconsin Department of Revenue  
Special Procedures Unit  
P.O. Box 8901  
Madison, WI 53708-8901

Wisconsin Department of Revenue  
ATTN: Bankruptcy Unit, MS 5-144  
PO Box 8901  
Madison, WI 53708-8901

Wisconsin Dept. of Workforce Development  
Division of Unemployment Insurance  
P.O. Box 8914  
Madison, WI 53708-8914

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cardmember Service  
P.O. Box 790408  
Saint Louis, MO 63179-0408

(d)Elan Financial Services  
Bankruptcy Department  
P.O. Box 5229  
Cincinnati, OH 45201

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Alexandria Lekan

End of Label Matrix	
Mailable recipients	26
Bypassed recipients	1
Total	27